

Whole Foods Market, Inc.

Comments on NOSB Aquaculture Standards

October 2006

Whole Foods Market is deeply committed to ensuring that the organic label—and the USDA standards behind the label—remain meaningful to our customers. Consequently, to avoid confusing our customers and weakening the value of the organic label, to date Whole Foods Market has refused to label any seafood in our stores as organic until there are standards in place in the United States. We greatly appreciate the board's efforts to create strong aquaculture standards and for receiving our comments.

Species or Production Method Specific Standards

The critical and overarching need is to develop rigorous organic standards for aquaculture, whether they are production-specific, species-specific, or undifferentiated. That being said, we agree with the Aquaculture Working Group (AWG) that it would be difficult to develop production-specific standards given the diversity of species cultured under the various systems and the range of requirements for each species. Species-specific standards are more sensible, and could be complemented with a set of general standards for organic aquaculture. This is similar to our approach at Whole Foods Market, whereby we are developing a set of general standards for aquaculture, with species-specific purchasing guidelines.

We discourage organic standards that outright prohibit using certain culture systems (e.g. net pen aquaculture) or raising certain species (e.g. carnivorous fish). Instead, we need to develop strong standards and challenge the industry to find innovative ways to meet these standards. That being said, it's possible that for some species, it may take longer to develop the organic standards, given the need for more information on certain issues (e.g. stocking densities). However, this should not be taken as a reason to propose weak standards.

Impact on the Environment

Whole Foods Market supports standards for organic aquaculture that aim to maintain or improve the environment—in this case water quality. As the AWG expresses, this area is often subject to value judgments stemming from people's differing ideas of what the environment should be used for and what "improving" the environment would look like. Because of this murkiness, we need to rely on science to help make these determinations. For example, scientific research should be able to help us determine whether net pens are improving benthic ecosystems or damaging them using biological and other measures. Furthermore, research studies should examine how integrated net pen systems affect biodiversity and productivity. Although unprecedented, demonstrating how on-farm practices preserve and protect off-farm biodiversity is an excellent standard to uphold.

Differences between Organic and Conventional Aquaculture

We support the majority of the proposed standards for differentiating between organic and conventional aquaculture. With respect to use of fish meal and fish oil, see our comments in the next section below.

Use of Fish Meal and Fish Oil

It is of critical importance to Whole Foods Market that the aquaculture industry finds ways to substantially reduce the amount of fish meal and fish oil that comes from wild-caught fish, targeted specifically for the aqua feed industry. As the AWG and interested constituents have discussed, many reduction fisheries are operating at unsustainable levels. At the same time, we also believe that feed for farmed aquatic animals should reflect the natural diet of the farmed species as closely as possible. This perspective is consistent with how we view organic dairy farming, whereby dairy cows ought to be pasture-raised.

Our concerns for the sustainability of the oceans and for fish welfare and nutrition lead us to suggest that organic standards for feed should focus on alternative methods for decreasing reliance on wild-caught fish. We suggest a greater focus on exploring the feasibility of using by-products of fish destined for human consumption. We recognize that feed from trimmings will need to meet guidelines for environmental contaminants and suggest that more work be done to assess decontamination processes. In addition, we suggest exploring the feasibility of using by-products of low food chain farmed fish that are already raised organically (once standards are in place) for human consumption. Additionally, we suggest exploring innovative approaches for meeting the dietary requirements of farmed fish such as the use of cultured algae.

We are not able to assess whether 12% fish meal and fish oil from wild-caught fish is appropriate. Instead, we suggest that the organic aquaculture standards focus on finding alternative solutions to reliance on wild-caught fish, such as those that we suggested above. Until there are high standards in this area, we do not think organic certification should be granted. Our customers trust that products sold under the organic label are meeting the required standards. To certify products and then remove the certification later would be confusing to customers. Consequently, we do not support a temporary allowance period for fish meal and fish oil. Regarding the second question, we believe that strong organic standards will provide an incentive for the aquaculture industry to be innovative and develop solutions that naturally meet the dietary requirements of cultured species.

Sources of Fish Meal and Fish Oil

No additional comments

Slaughter Byproducts in Aquaculture Feed

It is against Whole Foods Market standards to allow by-products of animal processing in livestock production or in aquaculture. At this point we do not know enough about the risks of disease transfer to authorize use of slaughter by-products in aqua feed. In addition, our customers that do not consume meat and poultry, but who enjoy and rely on fish as their preferred source of protein will not support the use of slaughterhouse by-products.

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